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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>DITECH HOLDING CORPORATION, <i>et al.</i>,</b>	:	<b>Case No. 19-10412 (JLG)</b>
	:	
<b>Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	
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	:	
<b>ANGELA and KENNETH ELLISON</b>	:	
<b>Plaintiffs,</b>	:	
	:	<b>Adversary Proceeding No.</b>
<b>v.</b>	:	
	:	<b>19-01296 (JLG)</b>
<b>DITECH FINANCIAL, LLC;</b>	:	
<b>Defendant.</b>	:	
	:	
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**STIPULATION AND PROPOSED ORDER**

<sup>1</sup> The Debtors confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404), which created the Wind Down Estates. The Wind Down Estates, along with the last four digits of each of their federal tax identification numbers, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). The Wind Down Estates' principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

WHEREAS, on June 11, 2019, Plaintiffs Angela and Kenneth Ellison (“**Plaintiffs**”) filed an adversary proceeding complaint against Ditech Financial LLC (“**Defendant**” and together with the Plaintiffs, the “**Parties**”), captioned *Angela and Kenneth Ellison v. Ditech Financial LLC* (Case No. 19-01296) (the “**Action**”).

WHEREAS, on October 3, 2019, the Plaintiffs filed the *Request for Entry of Default by Clerk* (ECF No. 7) (the “**Request**”).

WHEREAS, on November 4, 2019, the Defendant filed the *Defendant’s Opposition to Plaintiffs’ Request for Entry of Default by the Clerk of the Court* (ECF No. 10).

WHEREAS, the Parties appeared before the Bankruptcy Court on November 14, 2019 (the “**Hearing**”) and agreed that the Plaintiffs would withdraw their Request and extend the Defendant’s time to submit an answer to the Action.

WHEREAS, the Plaintiffs withdrew their Request following the Hearing.

THE PARTIES HEREBY STIPULATE AND AGREE, the Defendant’s deadline to move, answer, or otherwise respond to the complaint in the Action is stayed until further order of the Court.

Dated: December 20, 2019  
New York, New York

**PLAINTIFFS**

/s/ Angela Ellison  
Angela and Kenneth Ellison, *pro se*  
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*Attorneys for Defendant*

Dated: \_\_\_\_\_, 2019

New York, New York

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THE HONORABLE JAMES L. GARRITY, JR.  
UNITED STATES BANKRUPTCY JUDGE